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Cristiano Amparo and Abel Millares-Rojas

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

CRISTIANO AMPARAO, an individual;
ABEL MILLARES-ROJAS, an individual,

Plaintiffs,

v.

LEROY ROLDAN, an individual RYDER
TRUCK RENTAL LT; a Florida Corporation;
UNITED STATES OF AMERICA ex rel
UNITED STATES POSTAL SERVICE; DOE
I though X; and ROE CORPORATIONS I
through X

Defendants

2:24-cv-00394-JAD-BNW

**Stipulation for Extension of
Time for Plaintiffs to File an
Amended Complaint and for
Federal Defendants to File a
Response**

(Third Request)

Plaintiffs Cristiano Amparo and Abel Millares-Rojas, Defendant Ryder Truck Rental LT., and Defendants United States of America and Leroy Roldan by and through their respective counsel of record, hereby stipulate and agree to allow more time for Plaintiffs to file their amended complaint. As a result, the parties further



1 stipulate that Defendants' time to file a responsive pleading be extended. This is
2 the third request for an extension of time.

3 Specifically, the parties stipulate that Plaintiffs have until **July 5, 2024** to
4 file the amended complaint and Defendants have until **August 9, 2024** to file a
5 responsive pleading.

6 The reason why Plaintiffs failed to file the amended complaint within the
7 April 29, 2024 deadline set by this court was due to excusable neglect. Plaintiffs
8 retained new counsel—The Big Guns Injury Attorneys—on May 23, 2024, which
9 was about a month after the April deadline. Plaintiffs' counsel just learned about
10 this deadline set by the court.

11 Furthermore, based upon information and belief, Plaintiffs' prior counsel,
12 Kurt Lambeth, is no longer employed by Parke Law Firm and left before Plaintiffs
13 retained the Big Guns Injury Attorneys. It is also believed that before Mr. Lambeth
14 officially left Parke, he was in the process of limiting his workload there. During
15 this time, the amended complaint was not filed. Based on the excusable neglect of
16 prior counsel, there is good cause to allow Plaintiffs more time to amend their
17 complaint.

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1 This stipulated request is filed in good faith and not for the purpose of undue
2 delay.

3 Respectfully submitted this 17th day of June 2024.

4 **THE BIG GUNS INJURY**
5 **ATTORNEYS**

6 /s/ Adam C. Edwards

7 BENJAMIN CARMAN, ESQ.
8 ADAM C. EDWARDS, ESQ.
9 Attorneys for Plaintiffs
10 Cristiano Amparo and Abel
11 Millares-Rojas

JASON M. FRIERSON
UNITED STATES ATTORNEY

/s/ Virginia T. Tomova

VIRGINIA T. TOMOVA, ESQ.
Assistant United States Attorney

12 **IT IS SO ORDERED:**

13 
14 **UNITED STATES MAGISTRATE JUDGE**

15 **DATED:** June 18, 2024

